

Message

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**From:** Albright, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8C24CAABEA47449C95C94ACB6AC1C49E-DALBRIGH]  
**Sent:** 2/10/2020 6:47:18 PM  
**To:** Ho, Yenhung [Ho.Yenhung@epa.gov]  
**Subject:** RE: [Ext] RE: CLASS VI DATA CONFIDENTIALITY

Thank Calvin. Not sure I understand your last statement about transmitting to Cadmus. We will likely need that to happen also, but we would still need the information as well. Thanks, David

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**From:** Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Sent:** Monday, February 10, 2020 10:46 AM  
**To:** Albright, David <Albright.David@epa.gov>  
**Subject:** RE: [Ext] RE: CLASS VI DATA CONFIDENTIALITY

Hi David,

I checked with the help desk last Thursday about transmitting CBI via a FTP link provided by a outside party. They said it should be okay that we open the FTP link but can also double check with Darnell Baker of EMD (a security specialist?) - I am checking with Darnell right now.

Another thought on this is that CES can transmit the CBI to Cadmus.

Thanks,  
Calvin

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**From:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>  
**Sent:** Monday, February 10, 2020 10:31 AM  
**To:** Albright, David <Albright.David@epa.gov>  
**Cc:** Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Ho, Yenhung <Ho.Yenhung@epa.gov>; Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>; Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>  
**Subject:** RE: [Ext] RE: CLASS VI DATA CONFIDENTIALITY

Hi David,

Happy Monday.

Couple of things. We successfully completed our Class VI Permit Application (Phase 1 Preconstruction) submission this morning via the GS Data Tool. Per our conversation, the files submitted through the GS Data Tool contained no Confidential Business Information (CBI). Our plan is to submit to EPA directly a supplemental file, The Project Narrative, that contains CBI and is marked as such.

Last week we sent a link to a proposed method to securely transfer files, i.e. the Schlumberger DropFile site. Have you and your IT group had a chance to evaluate the DropFile site to see if it is an acceptable means of secure transfer of CBI?

Thank you again for your continued support. As always, please don't hesitate to contact me with any questions.

Kind Regards,  
-Rebecca

**Rebecca Hollis**

Director Business Development -



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[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)

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**From:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>

**Sent:** Wednesday, February 5, 2020 3:20 PM

**To:** Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>

**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>; Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Keith Pronske <[klpronske@cleanenergysystems.com](mailto:klpronske@cleanenergysystems.com)>; Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>

**Subject:** RE: [Ext] RE: CLASS VI DATA CONFIDENTIALITY

Thanks Wade. We will run this method by our IT folks and let you know if it is okay.

David Albright  
Manager, Groundwater Protection Section  
USEPA Region 9 (WTR-4-2)  
75 Hawthorne Street  
San Francisco, CA 94105  
415 972-3971

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**From:** Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>

**Sent:** Wednesday, February 5, 2020 2:52 PM

**To:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>

**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>; Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Keith Pronske <[klpronske@cleanenergysystems.com](mailto:klpronske@cleanenergysystems.com)>; Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>

**Subject:** RE: [Ext] RE: CLASS VI DATA CONFIDENTIALITY

Hi David

I recommend Schlumberger DropFile.

I just sent you a user name, password and test file to see if it works for you.

Cheers

Wade Zaluski, P.Geo.

Office: +1 403 509 4047 | Mobile: +1 403 969 2625

**From:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>  
**Sent:** Wednesday, February 5, 2020 3:37 PM  
**To:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>  
**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>; Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>; Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Keith Pronske <[klpronske@cleanenergysystems.com](mailto:klpronske@cleanenergysystems.com)>  
**Subject:** [Ext] RE: CLASS VI DATA CONFIDENTIALITY

Thank you for the prompt response, David.

Sounds like we agree on the proposed approach. We will wait to hear from you on whether or not EPA confirms this as acceptable.

We will consult 40 CFR Part 2 – Subpart B for guidance on CBI. Thank you.

Lastly, I will let the team at Schlumberger respond with their proposed method of secure electronic file transfer. I can say the system we have been using for file exchange between CES and Schlumberger has worked well and is pretty user friendly.

Best Regards,  
-Rebecca

**Rebecca Hollis**  
**Director Business Development -**

  
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**From:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>  
**Sent:** Wednesday, February 5, 2020 2:07 PM  
**To:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>  
**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>; Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>; Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Keith Pronske <[klpronske@cleanenergysystems.com](mailto:klpronske@cleanenergysystems.com)>  
**Subject:** RE: CLASS VI DATA CONFIDENTIALITY

Hi Rebecca,  
Per our conversation yesterday, I wanted to confirm that the approach we discussed for completing the GSDT upload/submittal is acceptable. Namely, you can redact any confidential business information (CBI) from what you upload to the GSDT and send the CBI separately to EPA – clearly marked as CBI.

As for legal guidance on CBI, please refer to 40 CFR Part 2 – Subpart B.

Lastly, to facilitate transmittal of CBI, it sounded like you all had a suggestion for doing so electronically. If that is your preference, could you please provide a brief explanation of the mechanism you propose to use so that we can run it by our IT folks.

Thanks,  
David

David Albright  
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**From:** Rebecca Hollis <[rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com)>  
**Sent:** Wednesday, February 5, 2020 1:57 PM  
**To:** Albright, David <[Albright.David@epa.gov](mailto:Albright.David@epa.gov)>; Ho, Yenhung <[Ho.Yenhung@epa.gov](mailto:Ho.Yenhung@epa.gov)>  
**Cc:** Natalie Nowiski <[NNowiski@slb.com](mailto:NNowiski@slb.com)>; Wade Zaluski <[WZaluski@slb.com](mailto:WZaluski@slb.com)>; Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>; Julian Enahoro Ogolo <[ogolo1@slb.com](mailto:ogolo1@slb.com)>; Keith Pronske <[klpronske@cleanenergysystems.com](mailto:klpronske@cleanenergysystems.com)>  
**Subject:** RE: CLASS VI DATA CONFIDENTIALITY

Good afternoon David,

Thank you again for taking the time yesterday to speak with us regarding confidential business information (CBI) used to develop our Class VI permit application.

Per our discussion, the GS Data Tool is not configured to accept CBI. CES and Schlumberger are concerned that interpretations of purchased (licensed) data included in our permit application files (mainly the Project Narrative) would be in violation of our current license agreements if uploaded as is. So, we discussed a potential path forward where we remove or redact the confidential plots/charts/images/etc. from the files to be uploaded to the GS Data Tool site. Then separately, transmit the CBI (plots/charts/images/etc.) to EPA via a mutually agreed upon method still TBD, e.g. hard copies, secure online electronic file transfer, etc. This way, 1) EPA will have all the required information necessary to evaluate our permit application, 2) CES-vendor confidential information will be protected, 3) the majority of the application material will be uploaded to the GS Data Tool site, and 4) the public process will not be interfered with (or at least only minimally). CES and Schlumberger estimate only about a dozen images or so would need to be redacted from the application files as they include details from licensed seismic and well data.

When we left the call I believe you were going to confirm that this was an acceptable path forward with EPA. Also, Natalie requested guidance from EPA regarding CBI.

Please let me know if I have correctly captured the discussion and if you have made any progress confirming our path forward.

Thank you again and Happy Wednesday,  
-Rebecca

**Rebecca Hollis**  
**Director Business Development -**



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-----Original Appointment-----

**From:** Wayne Rowe <[rowe5@slb.com](mailto:rowe5@slb.com)>

**Sent:** Tuesday, February 4, 2020 11:21 AM

**To:** Wayne Rowe; Albright, David; Ho, Yenhung; Rebecca Hollis; Natalie Nowiski; Julian Enahoro Ogolo

**Subject:** CLASS VI DATA CONFIDENTIALITY

**When:** Tuesday, February 4, 2020 3:30 PM-4:30 PM (UTC-08:00) Pacific Time (US & Canada).

**Where:** Skype Meeting

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